

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KRISTINA CHETWOOD, and SANDRA  
CASTELLON-GONZALEZ, individually,  
and on behalf of others similarly situated,

Plaintiffs,

v.

T- MOBILE USA, INC.

Defendant.

No. 2:19-cv-00458-RSL

**STIPULATED MOTION AND  
ORDER TO EXTEND DATES  
RELATED TO CONDITIONALLY  
CERTIFIED COLLECTIVE  
ACTION**

**STIPULATION**

WHEREAS, the Court entered the *Order Granting in Part Plaintiffs' Motion for Conditional Certification* (Doc. # 35) on April 7, 2020 (the "Order").

WHEREAS, the Order sets the following deadlines:

• **Production of Potential Opt-In Plaintiff Information, April 28, 2020.**

("[D]efendant shall produce to plaintiffs the names, last known addresses, and email addresses of all 'similarly situated' Associate Experts, Experts, and Senior Experts within 21 days of this Order, so that plaintiffs may notify them of the collective action." Order at p. 9.)

• **Meet and Confer and File Proposed Notice Forms, April 28, 2020.**

("[T]he parties shall meet and confer to prepare a proposed stipulated notice, reminder notice, and opt-in form. The parties are ORDERED to submit this information in a joint filing within

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21 days of this Order. If the parties fail to reach agreement, any disputes shall be noted in the filing or in separate notices filed by each party.” *Id.*)

WHEREAS the COVID-19 crisis has imposed unprecedented constraints and challenges on the parties and their counsel;

WHEREAS the Order presents a challenge to Defendant T-Mobile USA, Inc. (“T-Mobile”), particularly under the current circumstance, in meeting its obligation within the time set by the Order to accurately collect and produce the potential opt-in plaintiff information, which will involve information relating to 17 different call centers over a period of several years and will likely involve the collection of information for over 10,000 current and former employees.

WHEREAS the parties reached an agreement to make this stipulated motion to the Court to extend by three weeks the dates for (a) the production of potential opt-in plaintiff information by T-Mobile and (b) to parties to file proposed notice forms, as well as an agreement to allow, for the purposes of this case, for the tolling of the statute of limitations under the Fair Labor Standards Act for a corresponding period of three weeks for any person who opts-in to the collective action that has been conditionally certified by the Court’s Order (with such tolling agreement conditioned on the Court entering the proposed order requested in this stipulated motion).

The parties therefore agree and stipulate as follows:

1. Given the ongoing COVID-19 crisis and other factors impacting the parties, their counsel, and this litigation, there is good cause to extend by three weeks the Court’s current deadlines for (a) the production of potential opt-in plaintiff information and (b) the filing of proposed notice forms;

2. To address Plaintiffs’ concerns regarding any potential impact of the extensions requested in this stipulated motion, the parties agree that, should the Court enter an

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1 order granting the requested extensions, the parties' conditional agreement, for the purposes  
2 of this case, providing for the tolling of the statute of limitations under the Fair Labor  
3 Standards Act for a corresponding period of three weeks for any person who opts-in to the  
4 collective action that has been conditionally certified by the Court's Order, shall become  
5 effective.

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7 DATED this 17th day of April, 2020.

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STIPULATED MOTION AND ORDER TO  
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**ORDER**

Having considered the foregoing, IT IS HEREBY ORDERED as follows:

1. The date for T-Mobile to produce the potential opt-in plaintiff information pursuant to this Court's Order (Doc. # 35) shall be extended from April 28, 2020, to May 19, 2020; and
2. The date by which the parties shall file proposed notice forms pursuant to this Court's Order (Doc. # 35) likewise shall be extended from April 28, 2020, to May 19, 2020.

IT IS SO ORDERED.

DATED this 21st day of April, 2020.



Hon. Robert S. Lasnik  
United States District Judge